

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

GEORGE O. HAGEMAN (CABN 332457)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6511
Fax: (415) 436-7200
George.Hageman@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 3:23-CR-00076-JD
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE HEARING AND EXCLUDE TIME
v.)	FROM MAY 8, 2023, TO JUNE 5, 2023
)	
ESMUN MOYSES MORAL-RAUDALES,)	
)	
Defendant.)	

Counsel for the United States and counsel for the defendant Esmun Moyses Moral-Raudales hereby jointly request to continue the status conference currently set for May 8, 2023, to June 5, 2023.

Additionally, the parties stipulate that time be excluded under the Speedy Trial Act from May 8, 2023, through June 5, 2023, so that the parties may continue to review discovery and discuss a potential resolution. For these reasons, the parties stipulate and agree that excluding time until June 5, 2023 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from May 8, 2023, through June 5, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from
STIPULATION AND ~~PROPOSED~~ ORDER TO CONTINUE HEARING AND EXCLUDE TIME
Case No. 3:23-CR-00076-JD

counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: May 5, 2023

/s/

GEORGE O. HAGEMAN
Assistant United States Attorney

DATED: May 5, 2023

/s/

CANDIS MITCHELL
Counsel for Defendant Esmun Moyses Moral-
Raudales

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court continues the hearing from May 8, 2023, to June 5, 2023. The Court finds that failing to exclude the time from May 8, 2023, through June 5, 2023, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 8, 2023 to June 5, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 8, 2023 through June 5, 2023 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: May 5, 2023



JAMES DONATO
United States District Judge